

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and The Management
Board for Puerto Rico

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et. al.

Debtors.

PROMESA
Title III

No. 17-003283

RESPONSE TO OBJECTION TO CLAIM NUMBER 17107

TO THE HONORABLE COURT:

NOW COMES, creditor Helvia S. Caparros Santos, represented by her undersigned attorneys, and respectfully states and prays:

1. On or about May 21, 2018, the appearing creditor filed proof of claim number 17107 in these proceedings, claiming the amount of \$12,145,25. She attached to her proof of claim the monthly statement she had received from UBS Paine Webber during the month of May of 2017 (which reflected the afore stated amount as a loss resulting from her investment in Puerto Rico bonds).

2. Recently, on or about January 22, 2021, the Financial Oversight and Management Board for Puerto Rico (“FOMB”) filed an objection to the aforementioned claim, alleging as follows: “the proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA and/o (sic)”.

3. As noted above, the appearing creditor attached to her proof of claim a copy of the May 2017 Investment Account statement issued to her by UBS Paine Webber which, in turn, references her investment account with that institution (account number JX 54049 4D). This statement serves as the basis of her claim and is the supporting documentation in her possession for asserting her claim against the Commonwealth of Puerto Rico.

4. Previously, at docket entry number 8297, the FOMB had likewise objected to the appearing creditor's claims filed in these proceedings, alleging in effect that she did not have standing to assert a claim and that UBS Paine Webber was the proper party with standing to assert and defend her claims. The appearing creditor responded to that objection and rejected the same at docket entry 8601. Nevertheless, this Honorable Court granted that earlier objection and denied her response at docket entry 9099. Accordingly, UBS Paine Webber should be held liable for the assertion and defense of her claims based upon her investments in bonds issued by the Commonwealth of Puerto Rico.

5. At the very least, the May 2017 UBS Paine Webber statement issued to the appearing creditor shows that as of May of 2017, her investment account in Puerto Rico bonds had a value of \$7,860.00.

WHEREFORE, the appearing creditor respectfully requests this Honorable Court to take note of the foregoing as her response to the latest Objection of the Fiscal Control Board to her proof of claim number 17107 and to allow her proof of claim in the amount stated therein and/or in whatever other amount may be due to her based on her afore-referenced investment account with UBS Paine Webber (for example, in the amount of \$7,860.00) and/or to grant her whatever other remedy it may deem appropriate at law or in equity under the circumstances surrounding the afore-mentioned proof of claim.

RESPECTFULLY SUBMITTED,

In San Juan, today the 16th day of February 2021.

I HEREBY CERTIFY that on this date the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system which will send notification of said filing to all CM/ECF participants.

By: s/ Patrick D. O'Neill
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